

Colorado Limited Gaming Control Commission

Minutes of Public Session
November 20, 2025

PUBLIC SESSION

I. Call to Order

Chair Tipton called the November 20, 2025, meeting of the Colorado Limited Gaming Control Commission (CLGCC) to order at 9:16 a.m. MDT virtually via in-person at the Division Office at 1707 Cole Blvd., Suite 300, Lakewood, CO 80401, and via Zoom video conference. Commissioners Faber and Workman were present in person and Commissioners Tipton and Hyland were present via Zoom, and a quorum existed. Commissioner Cary was excused for good cause.

Officials & Administrators in Attendance

John Tipton, Commissioner, Chair via Zoom
Kevin Hyland, Commissioner, Vice-Chair via Zoom
Phil Workman, Commissioner
Mike Faber, Commissioner
Michael Phibbs, Senior Director, Specialized Business Group
Christopher Schroder, Director
Kirsten Gregg, Chief of Investigations
Allen Hiserodt, Chief of Investigations, Sports Betting
Kenya Collins, Director of Administration via Zoom
Bradford Jones, Senior Assistant Attorney General
Leonela Urrutia, Assistant Attorney General
Paul Hogan, Chief Auditor
J. Wolff, Agent in Charge, Central City/Black Hawk
Andrew Fulton, Agent in Charge, Sports Betting
John Madruga, Agent in Charge, Background Unit
Breanne Nolan, Executive Assistant, Secretary to CLGCC

EXECUTIVE SESSION

The Commission voted unanimously to go into Executive Session pursuant to sections 24-6-402(3)(a)(III), 44-30-521(1)(a), 44-30-526(1)(d), and 44-30-1507 of the Colorado Revised Statutes to review confidential background licensing reports that were scheduled for consideration in the Public Session.

The Executive Session was called to order by Chair Tipton at 9:21 a.m. MST.

PUBLIC SESSION (RECONVENED)

The Public Session was called back to order by Chair Tipton at 10:49 a.m. MST.

II. Approval of Licensing Actions

The Commission voted unanimously to approve the renewal of the Retail and Master Licenses for Grand Z Casino Operator LLC d/b/a Grand Z Casino; Johnny Z Casino Operator LLC d/b/a

Dragon Tiger Casino; and Z Casino Black Hawk Operator LLC d/b/a Z Casino Black Hawk. These Retail and Master licenses will expire two years from their current dates of expiration.

The issuance of the above Master licenses does not concurrently grant approval to entities or individuals with whom these licensees have entered into, or considered entering into contracts for sports betting operations or internet sports betting operations; nor does it preclude any entities or individuals from being called forward by the Division to conduct a comprehensive background investigation regarding their suitability to operate in Colorado.

The Commission voted unanimously to approve the renewal of the Manufacturer/Distributor licenses for Colorado Resorts Operator LLC. This Manufacturer/Distributor license will expire two years from its current date of expiration.

The Commission and Chris Soriano, Vice President and Chief Compliance Officer, Penn Entertainment discussed and confirmed that the licensee had agreed to the suggested condition on its Retail, Master, Manufacturer/Distributor and Operator licenses for Ameristar Casino Black Hawk, LLC d/b/a Ameristar Casino Black Hawk and that the investors were aware of the condition.

The Commission voted unanimously to approve the renewal of the Retail and Master licenses for Ameristar Casino Black Hawk, LLC d/b/a Ameristar Casino Black Hawk. These Retail and Master Licenses will expire two years from their current dates of expiration.

The issuance of the above Master license does not concurrently grant approval to entities or individuals with whom this licensee has entered into, or considered entering into contracts for sports betting operations or internet sports betting operations; nor does it preclude any entities or individuals from being called forward by the Division to conduct a comprehensive background investigation regarding their suitability to operate in Colorado.

As a condition for licensure in accordance with C.R.S. 44-30-506, Ameristar and its parent company, PENN Entertainment, Inc. (Penn), shall not permit an investor, who may or may not have claimed passivity previously, to acquire, assume, or exercise any control and/or influence over Penn and/or Ameristar, unless and until the Commission has determined that the investor is found suitable in accordance with the Gaming Act (Article 30 of Title 44, C.R.S.) and the Commission's limited gaming regulations in 1 C.C.R. 207-1. This condition shall apply to any investor who (1) proposes to nominate, appoint, replace, or remove any officer, director, or key management personnel with Penn and/or Ameristar; (2) seeks to exercise any rights or powers that could materially affect the management, operations, or strategic direction of Penn; or (3) proposes to merge with, consolidate, or reorganize Penn in a manner that alters control or governance.

The Commission voted unanimously to approve the renewal of the Manufacturer/Distributor licenses for Ameristar Casino Black Hawk, LLC d/b/a Ameristar Casino Black Hawk. This Manufacturer/Distributor license will expire two years from their current dates of expiration.

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investor who (1) proposes to nominate, appoint, replace, or remove any officer, director, or key management personnel with Penn and/or Ameristar; (2) seeks to exercise any rights or powers that could materially affect the management, operations, or strategic direction of Penn; or (3) proposes to merge with, consolidate, or reorganize Penn in a manner that alters control or governance.

The Commission voted unanimously to approve the renewal of the Operator license for Ameristar Casino Black Hawk, LLC d/b/a Ameristar Casino Black Hawk. This Operator License will expire two years from its current date of expiration.

As a condition for licensure in accordance with C.R.S. 44-30-506, Ameristar and its parent company, PENN Entertainment, Inc. (Penn), shall not permit an investor, who may or may not have claimed passivity previously, to acquire, assume, or exercise any control and/or influence over Penn and/or Ameristar, unless and until the Commission has determined that the investor is found suitable in accordance with the Gaming Act (Article 30 of Title 44, C.R.S.) and the Commission's limited gaming regulations in 1 C.C.R. 207-1. This condition shall apply to any investor who (1) proposes to nominate, appoint, replace, or remove any officer, director, or key management personnel with Penn and/or Ameristar; (2) seeks to exercise any rights or powers that could materially affect the management, operations, or strategic direction of Penn; or (3) proposes to merge with, consolidate, or reorganize Penn in a manner that alters control or governance.

The Commission voted unanimously to approve the renewal of the Internet Sports Betting Operator license for Penn Sports Interactive d/b/a Penn Sports Interactive – ESPN Bet. This Internet Sports Betting Operator license will expire two years from its current date of expiration.

The Commission voted unanimously to approve the reissuance of the Temporary Internet Sports Betting Operator license for Hillside (Colorado) LLC d/b/a bet365. This Internet Sports Betting Operator license was approved pending the final results of the Division's background investigation.

The Commission voted unanimously to approve the renewal of the Vendor Major licenses for Penn Sports Interactive d/b/a Penn Sports Interactive - ESPN Bet and Dime Line Trading (Colorado) LLC – f/k/a Delavan Lake Trading (Colorado) LLC. These Vendor Major licenses will expire two years from their dates of issuance.

In accordance with Commission Policy 24-01, the Commission voted unanimously to approve the First issuance and Renewal of the Vendor Minor Licenses listed in the Consent Agenda in the November 2025 public packet. These Vendor Minor Licenses shall expire two years from their current dates of issuance or expiration.

III. Opportunity for the Public to Address the Commission

The Chair gave anyone from the public the opportunity to address the Commission on any item that did not appear on the agenda. No members of the public came forward for comment.

IV. Consideration of Limited Gaming Financial Statements for September 2025

The Commission voted unanimously to approve the Statement of Gaming Revenues, Gaming Taxes, and Expenditures (unaudited) for the three months ending on September 30, 2025, and to authorize its distribution.

V. Consideration of Division Sports Betting Financial Statement for September 2025

The Commission voted unanimously to approve the Statement of Sports Betting Revenues, Taxes, and Expenditures (unaudited) for the three months ending on September 30, 2025, and to authorize its distribution.

VI. Consideration of the Stipulation & Agreement Regarding BetMGM, LLC d/b/a Roar Digital, Temporary Internet Sports Betting Operator License No. 46474397

Bradford Jones, Senior Assistant Attorney General, presented the Stipulation & Agreement regarding BetMGM, LLC d/b/a Roar Digital.

Discussion occurred between the Commission, Senior Assistant Attorney General Jones, and Chief of Sports Betting Allen Hiserodt regarding the definition of a proposition bet and the role of a live trader.

Discussion occurred between the Commission and Director Christopher Schroder about the process for reporting violations from operators and how future disciplinary action would be determined.

The Commission voted unanimously to approve and authorize the Chair to sign and issue the: Stipulation and Agreement for Case No. DOG25004556 in the matter of BetMGM, LLC d/b/a Roar Digital Temporary Internet Sports Betting Operator License No. 46474397.

VII. Consideration of Limited Gaming Rule 12

The Commission voted unanimously to open the rulemaking hearing on Colorado Limited Gaming Rule 12.

Georgia McBride, Chief Technology Officer, was sworn in and gave the presentation for amendments to Colorado Limited Gaming Rule 12.

Discussion occurred between the Commission and Chief Technology Officer McBride regarding the definition of a multi-link progressive game and continuity of the games throughout other jurisdictions.

The Chair gave anyone from the public the opportunity to address the Commission on Colorado Limited Gaming Rule 12. No members of the public came forward to testify.

The Commission voted unanimously to close the public portion of the rulemaking hearing for Limited Gaming Rule 12.

Following deliberation, the Commission voted unanimously to approve the proposed amendments to Limited Gaming Rule 12, as presented.

The Commission voted unanimously to close the rulemaking hearing on Limited Gaming Rule 12.

VIII. Consideration of Limited Gaming Rules 2 & 29

The Commission voted unanimously to open the rulemaking hearing on Colorado Limited Gaming Rules 2 & 29.

Corrie Martinez, Responsible Gaming Manager, was sworn in and gave the presentation for amendments to Colorado Limited Gaming Rules 2 & 29.

Discussion occurred between the Commission and Director Schroder regarding the amendment to Rule 30-2905(2)(b) referencing the phrase “taxable jackpot.” Chair Tipton explained that he wished to remove “taxable” from the rule, as checking identification for all patrons who win a jackpot should occur, regardless of the taxability of the winnings.

Chair Tipton suggested that in addition to the listing of the 1-800-GABMLER number, a clarification statement “or a similar number with the designated function,” should be included.

Commissioner Hyland asked if there was designated language or a statute that outlined prosecution for excluded patrons who were found gambling on casino properties. Senior Assistant Attorney General Bradford Jones responded that charges would be up to each jurisdiction’s District Attorney and that the language existed in the rule to clarify that excluded persons found on casino property could be subject to prosecution.

Commissioner Hyland asked how the rule changes would be presented to the many advertisers who were licensed. Director Christopher Schroder stated that all versions of the rules, including the accepted changes, were sent via email to all stakeholders during the rulemaking process, which included advertisers.

The Chair invited any members of the public to testify on Limited Gaming Rules 2 & 29.

Charlie Ball, representative from Wildcard and Sasquatch casinos, stated that due to the low jackpot threshold of \$100 to \$150 at their casinos, checking credentials of each jackpot winner (up to 700 per day), would overwhelm staff with self-exclusion list checks. Charlie Ball explained that the inclusion of “taxable jackpot” in Rule 29 would decrease the amount of self-exclusion checks of jackpot winners to those who won \$1200 and would ease the burden on casino staff.

Peggy Brown, a representative from the Problem Gambling Coalition of Colorado (PGCC), stated that in her experience, jackpots less than \$1200 won by excluded players were not and often not checked against the exclusion list; therefore, players who snuck into and played at casinos were not identified until they hit the \$1200 taxable jackpot.

The Commission voted unanimously to close the public portion of the rulemaking hearing on Colorado Limited Gaming Rules 2 & 29.

The Commission voted unanimously to approve the proposed amendments to Limited Gaming Rule 2, as presented.

Discussion occurred between the Commission and Senior Assistant Attorney General Jones regarding amendments to Limited Gaming Rule 29. Senior Assistant Attorney General Jones suggested that the motion for Rule 29 be withdrawn, and the Chair should reopen the floor for public comment so that Division staff could address Commissioners’ questions.

The Commission voted unanimously to re-open the public comment portion of the rulemaking hearing regarding Limited Gaming Rule 29.

Commissioner Faber asked if an operator could rebrand a jackpot to a naming convention such as “big win” to skirt the taxable jackpot portion of the rule amendment. Director Schroder stated that an operator chooses its system/machines to “lock” up on a designated amount to determine a jackpot. He explained that even if the jackpot were renamed to something else, the system lock would still occur at the designated amount.

Commissioner Workman indicated that checking the exclusion list seemed to be placing a time burden on operators whose jackpot thresholds were lower than the \$1200 taxable amount. He asked if these operators came forward during the stakeholder process and whether that was the consideration made when including the phrase “taxable jackpot.” Director Schroder responded that in the Division’s opinion, any time a person wins a jackpot there should be an interaction for prize or monetary transactions to determine if the patron is excluded. He also explained that the Division took into account the smaller jackpot threshold which increased the interaction with casino staff and patrons to a level that might have been burdensome. As such, the Division revised the proposed rule amendments to add “taxable jackpot” which would be helpful to those operators.

Commissioner Hyland asked to hear the PGCC’s thoughts on problem gamblers going into and receiving jackpots from casinos. Chigbo Nzoiwu, Director of Programs, PGCC, was sworn in and stated that this issue had been discussed internally as well as by individuals who attend programs at the Problem Gambling Center. He explained that problem gamblers had expressed that unless they reach a jackpot requiring identification checks, they are still receiving hand pays, which results in them remaining in the casino and increasing the burden on their gambling addiction. He stated that if problem gamblers are not IDed at the door or identified by an exclusion list check prior to entering the casino floor, they are put at more risk.

Chair Tipton stated that these issues were not addressed by any information presented regarding Limited Gaming Rule 29.

Peggy Brown, representative from PGCC, stated that regardless of taxable or non-taxable clarification, excluded persons could gamble without consequence until they reach \$1200 jackpot and have no incentive to stay away. She explained that in the future, there should be consideration for better means to identify individuals on the exclusion list before they can enter and gamble at casinos.

Director Schroder stated that since Colorado was now an unlimited market, the Division was working on cage and security ICMPs and that rule changes and reform would be made to address responsible gaming.

The Commission voted unanimously to close the public comment portion of the rulemaking hearing regarding Limited Gaming Rule 29.

In public deliberations, Commissioner Hyland stated that after hearing public comment, he was comfortable accepting the amendments to Rule 29, as presented by the Division.

Chair Tipton explained that he wished to remove the phrase “taxable jackpot” and replace it with “jackpot,” so that there were no excuses to not reference the exclusion list for jackpot winners.

Commissioner Workman stated that he preferred amending the rule and removing “taxable jackpot.”

Commissioner Faber concurred with the Chair’s statement.

The Commission voted 3 to 0 to approve the proposed amendments to Limited Gaming Rule 29, with the exception of removing the reference to “taxable” in the phrase “taxable jackpot” in Regulation 30-2905(2)(b) and so it would just state “jackpot.” Commissioner Hyland abstained from the vote.

The Commission voted unanimously to close the rulemaking hearing on Limited Gaming Rules 2 & 29.

The Commission took a recess from the public session at 1:02 p.m.

The public session was called back to order at 1:15 p.m.

IX. Consideration of Sports Betting Rules 1, 6 & 9

The Commission voted unanimously to open the rulemaking hearing on Colorado Sports Betting Rules 1, 6 & 9.

Corrie Martinez, Responsible Gaming Manager, was sworn in and presented Sports Betting Rules 1, 6 & 9.

Chair Tipton asked how often the exclusion list was updated and distributed to operators. Director Schroder responded every 1 to 2 days.

Commissioner Faber asked, in reference to Sports Betting Rule 9.4, how the prominence of the help number displayed on advertisements was determined. Director Schroder stated that the prominence was based on the ability of the average person to distinguish the help number legibly on the advertisement.

The Chair gave anyone from the public the opportunity to address the Commission on Sports Betting Rules 1, 6 & 9. No members of the public came forward to testify.

The Commission voted unanimously to close the public comment portion of the rulemaking hearing on Sports Betting Rules 1, 6 & 9.

The Commission voted unanimously to approve the amendments to Colorado Sports Betting Rules 1, 6 & 9, as presented by the Division.

The Commission voted unanimously to close the rulemaking hearing on Sports Betting Rules 1, 6 & 9.

X. Consideration of Organizational Matters

Approval of Minutes

The minutes from the September 18, 2025, and October 16, 2025, public sessions of the Colorado Limited Gaming Control Commission were approved, as presented.

Directors Updates

Michael Phibbs, Senior Director, Specialized Business Group, stated that the Division would move into its new office at the Richmond building in Black Hawk on December 15th. He explained that the office should be fully functional by the beginning of the calendar year. He stated that the vendor for the new licensing and case management system was satisfied with negotiations, and the build-out schedule was in process. Chair Tipton asked if the new system would allow fingerprint sharing between Specialized Business Group Divisions for licensees. Senior Director Phibbs confirmed that there will be one system that integrates all licenses within the Divisions and would be more user friendly.

Christopher Schroder, Director, Division of Gaming, stated that a notification email would be sent out indicating that after February 1, 2026, all verbal approvals for Internal Control Minimum Procedures (ICMPs) variances would be null and void. He explained that the notification would state that all approvals not in writing would need to be turned in by February 1, 2026. He concluded by stating he would not be present for the December meeting and Deputy Director Kirsten Gregg would cover for him.

XI. Opportunity for the Industry to Address the Commission

The Chair gave anyone from the Industry an opportunity to address the Commission on current issues and events. No one came forward to address the Commission.

XII. Annual Commissioner Training

Bradford Jones, Senior Assistant Attorney General, suggested that the annual Commissioner training be tabled until the December 18th meeting. The Commission agreed to table the training.

XIII. Adjournment

The Commission voted unanimously to adjourn the November 20, 2025, meeting of the Colorado Limited Gaming Control Commission at approximately 1:43 p.m. MDT.

Breanne Nolan, Secretary to the Colorado Limited Gaming Control Commission